

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington D.C. 20554**

|  |   |          |
|--|---|----------|
| In the matter of                               | ) |          |
|  | ) |          |
| Fixed Wireless Communications Coalition,       | ) | RM-11610 |
| Petition to Amend Part 101 of the Commission's | ) |          |
| Rules for Automated Government Frequency       | ) |          |
| Coordination and Conditional Licensing in the  | ) |          |
| 23 GHz Fixed Service Band                      | ) |          |
|  | ) |          |

**Comments by Ceragon Networks, Ltd.**

Ceragon Networks, Ltd.<sup>1</sup> hereby respectfully submits comments in support of the above captioned Petition for Rulemaking made by the Fixed Wireless Communication Coalition (FWCC) to expand the number of 23 GHz channels eligible to operate under the terms of Conditional Authorization <sup>2</sup>.

**Ceragon Networks Supports the FWCC Proposal**

Ceragon Networks supports the FWCC proposal to eliminate the restriction on the number of 23 GHz channel pairs eligible to operate under Conditional Authorization. As a

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<sup>1</sup> Ceragon Networks Ltd. (NASDAQ/TASE: CRNT) is a leading provider of high-capacity LTE-ready wireless backhaul solutions for cellular and fixed wireless operators, enterprises and government organizations. Ceragon's FibeAir® product family offers scalable solutions for wireless transport of broadband services. Operating across multiple frequencies for IP and SONET/SDH protocols, FibeAir systems support the emerging needs of next-generation networks that are evolving to all-IP based services. Ceragon leads the market in IP backhaul, offering a unique, native IP solution that provides the efficient, robust connectivity required for LTE, WiMAX and converged networks. More information is available at [www.ceragon.com](http://www.ceragon.com).

<sup>2</sup> See 47 C.F.R. § 101.31.

supplier of microwave radio equipment, we have experienced an increase in demand for radios operating in the 23 GHz band. This increase in demand coincides with broadband carriers using short microwave links to connect their cell sites. The distance between cell sites is often small; hence the 23 GHz band is ideal for linking these sites together in either ring or mesh topologies, and using microwave to backhaul traffic to hub locations. Furthermore, as capacity requirements continue to increase, the availability of channel bandwidths up to 50 MHz in the 23 GHz band makes the band even more attractive.

Because operators gravitate to those channel pairs eligible for Conditional Authorization, deployment of many short backhaul microwave links using only the six channel pairs eligible for operation under Conditional Authorization results in overuse of those six channel pairs and creates localized congested areas. As a consequence, six channel pairs are used extensively and the remainder of the band is seriously underutilized.

Ceragon believes it is possible to build upon the success of Web-based frequency coordination with Government facilities operating in the 70/89/90 GHz bands and include the 23 GHz band in the process, thus making it possible to expand the number of 23 GHz channel pairs eligible for Conditional Authorization.

### **Summary**

Ceragon Networks supports the FWCC proposal for increasing the number of 23 GHz channels eligible for operation under Conditional Authorization. We support the FWCC Petition in its entirety and believe it will result in a more uniform use of the 23 GHz band by Part 101 licensees. We encourage the Commission to move forward with a Notice of Proposed Rulemaking as quickly as possible.

Respectfully submitted,

CERAGON NETWORKS

A handwritten signature in dark ink, appearing to read "Mike Mead". The signature is fluid and cursive, with the first name "Mike" and last name "Mead" clearly distinguishable.

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